

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

**Johns Manville Corporation
408 Perry Street
Defiance, Ohio 43512**

ATTENTION: Noah McManus, Plant Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Johns Manville Corporation (JMC or you) to submit certain information about the facilities located at 408 Perry Street (Plant #2) and 925 Carpenter Road (Plant #8), Defiance, Ohio (the facility). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

JMC owns and operates an emission source at the Defiance, Ohio facility. We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan and the CAA.

JMC must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency

Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

JMC must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

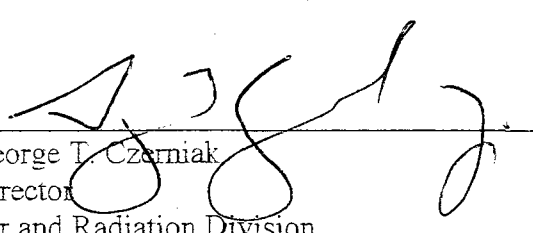
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject JMC to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Manoj P. Patel at (312) 353-3565 or patel.manojkumar@epa.gov.

Date

9/2/15


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should

allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*,

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Provide the following information for the Johns Manville plants located at 408 Perry Street (Plant #2) and 925 Carpenter Road (Plant #8), Defiance, Ohio, using the instructions and definitions provided in Appendix A pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a). EPA requests that all information be provided in electronic format (.pdf or .xls) format.

1. For each project listed in Appendix D of this information request (referencing projects identified in Johns Manville's response to question 6 of EPA's September 30, 2013 information request), provide a copy of all documents related to and including the following:
 - a. all associated capital appropriation requests and approvals;
 - b. all work orders [with and without authorizing signature(s)], work request project completion reports, and justification reports;
 - c. outage reports, detailing all work completed at the time of the outage;
 - d. total project cost, including any cost incurred by other owners and/or operators;
 - e. the actual out of service date (month/day/year) for the listed projects;
 - f. the actual date (month/day/year) the unit returned to commercial operation following completion of the capital project(s);
 - g. project justifications (including all cost/benefit and alternative options analyses);
 - h. estimated date(s) that component was previously replaced;
 - i. whether the capital improvement was associated with a life extension project, capacity increase, efficiency enhancement, or reliability improvement;
 - j. equipment specifications;
 - k. a copy of any emissions calculations performed before and after the capital project was completed;
 - l. any engineering analysis, performance test showing original as-built performance and performance for the period immediately prior to and immediately following completion of each capital project;
 - m. any evaluation conducted to verify pre- and post- completion performance of the capital project under any equipment vendor guarantee;
 - n. all associated purchase orders;
 - o. provide a copy of all engineering analyses, correspondence, memoranda, telephone discussion summaries and any other communication, including but not limited to Board of Directors reports, meeting minutes, and annual reports, that describe the benefits, provides justification for, or otherwise explains the nature, extent, cost and frequency of each capital project. This request includes all communications both before and after the capital project was undertaken; and
 - p. All documents, including, but not limited to, emails, reports, memoranda, and phone discussion summaries regarding Prevention of Significant Deterioration and New Source Review (PSD/NSR) applicability for any work occurring at, during, or around the time of outage.

2. Provide copies of all PSD/ NSR permits received and permit applications submitted for the period January 1, 2012, to the present. Also include a copy of all synthetic minor PSD/NSR permits that involve netting that allowed the facility to avoid major NSR/PSD requirements.
3. Provide a list of all capital expenditures greater than \$50,000 commenced at any emissions unit from July 1, 2013, to the present. This list should identify the unit, the approximate date of each project, a brief description of each project, a breakdown of each expense, vendor information, and the fixed capital cost of each project in nominal dollars.
4. Provide a list of all emission tests conducted at the facility for any reason, from July 1, 2013, to the present, and provide copies of all emission test reports. Emission testing includes, but is not limited to, compliance testing, engineering testing, investigating testing, experimental testing, and testing for general information that contains all test runs or a partial run(s). Use the following guidelines for compiling the list and preparing copies of the stack test reports:
 - a. **List:** Identify the emissions unit, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (e.g., before or after emission unit or air pollution control device), and the production rate of the associated emission unit. For each test during which the emission unit was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with the Ohio Environmental Protection Agency (Ohio EPA).
 - b. **Copies:** Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
5. Provide copies of all quarterly reports, semi-annual compliance reports, deviation reports, or equivalent documents submitted to Ohio EPA or EPA for the facility since January 2010.
6. Provide the following information for the years 2013 to the present, in an electronic spreadsheet:
 - a. actual production of glass in tons per day (include a description of how the production rate is calculated at the facility);
 - b. actual production of fiberglass product in tons per day for each "Pot and Marble Process" line (include a description of how the production rate is calculated at the facility); and
 - c. actual annual emissions reported to the local and/or state agency. Provide the method for the annual emissions calculations, including the basis of any emission factors used, and a copy of the report.
7. Provide an electronic spreadsheet in .xls format with the following daily information for the thermal oxidizer (TO) from January 2010 to the present:

- a. the hours of and reasons for the by-passing of the collection system and TO when the curing ovens or the other processing equipment are in operation (if any);
- b. records of any corrective action taken in response to a TO bypass in item (a) above (if any);
- c. The recorded 3-hours block of operating temperature;
- d. the minimum operating temperatures established for regulatory compliance, the method used to establish the values (reference performance test as applicable), and the effective date of these operating limits;
- e. deviation records of the combustion temperatures including the date and time the deviation began, the magnitude of the deviation at that time, the date the investigation was concluded, the name(s) of personnel that conducted the investigation and the finding and recommendations;
- f. the corrective action taken for each deviation from the minimum operating temperature including, but not limited to, the date the corrective action initiated and finished, total period of time (in minutes), the temperature readings immediately after the corrective action was implemented, and the name(s) of the personnel who performed the work;
- g. records of the calibration of the temperature monitor; and
- h. records of quarterly and annual inspections of the control equipment.

8. Provide an electronic spreadsheet in .xls format with the following daily information for the gas scrubber from January 2010 to the present:

- a. The recorded hourly, 3-hour blocked average pressure drop, liquid flow rate, or chemical feed rate across the scrubber;
- b. The pressure drop operating range established for regulatory compliance, the method used to establish the values (reference performance test as applicable), and the effective date of these operating limits;
- c. deviation records for the pressure drop, liquid flow rate, or chemical feed rate including the date and time the deviation began, the magnitude of the deviation at that time, the date the investigation was concluded, the name(s) of personnel who conducted the investigation and the findings and recommendations;
- d. The corrective action taken for each deviation from the pressure drop operating range, liquid flow rate, or the chemical feed rate including, but not limited to, the date the corrective action was initiated and finished, the total period of time (in minutes), the readings immediately after the corrective action implemented, and the name(s) of the personnel who performed the work;
- e. The minimum scrubber water flow rate established for regulatory compliance, the method used to establish the values (reference performance test as applicable), and the effective date of these operating limits;
- f. The minimum scrubber chemical feed rate established for regulatory compliance, the method used to establish the values (reference performance test as applicable), and the effective date of these operating limits;
- g. The date and duration of all scrubber shutdowns; and

- h. The date and duration of periods that the scrubber was not in operation but associated emission units were in operation.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

APPENDIX D

Location	Number
Defiance 02	2711012
Defiance 02	2711037
Defiance 02	2711063
Defiance 02	2711064
Defiance 02	2711095
Defiance 02	2711099
Defiance 02	2851921
Defiance 02	10071101
Defiance 02	10071202
Defiance 02	10071105
Defiance 02	10071300
Defiance 02	10071304
Defiance 08	2851672
Defiance 08	2851743
Defiance 08	2851864
Defiance 08	10071001
Defiance 08	10081006
Defiance 08	2851912
Defiance 08	2851930
Defiance 08	10081002
Defiance 08	10081000
Defiance 08	10081100
Defiance 08	10081108
Defiance 08	10081210
Defiance 08	10081200

CERTIFICATE OF MAILING

I, Loretta Shafer, certify that I sent a Request to Provide Information Pursuant to the
Clean Air Act by Certified Mail, Return Receipt Requested, to:

Noah McManus, Plant Manager
Johns Manville Corporation
408 Perry Street
Defiance Ohio 43512

Brent Tracy, Associate General Counsel
Environmental, Health & Safety
Johns Manville Corporation
717 17th Street
P.O. Box 5108
Denver, Colorado 80217-5108

7014 2870 00019580 4633

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Mark Budge, APC Manager
Ohio Environmental Protection Agency
347 North Dunbridge Road
Bowling Green, OH 43402

On the 3rd day of September 2015.

Kathy Jones
for Loretta Shaffer, Administrative Program
Assistant
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7014 2870 0001 9580 4626